



SOUTHERN CALIFORNIA
EDISON

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A Edward Scherer
Manager of Nuclear
Oversight and Regulatory Affairs

16

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(67FR 57084)

October 25, 2002

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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Rulemakings and Adjudications Staff

Subject: **Southern California Edison Comments on Direct Final Rule and Proposed Rule, "Electronic Maintenance and Submission of Information," 67FR57084 (September 6, 2002)**

Dear Sir or Madam:

This letter provides Southern California Edison's (SCE) comments on the subject Direct Final Rule and Proposed Rule. SCE's primary concern is with the proposed requirement to submit a paper copy in additional to the CD-ROM submission.

Regulatory Issue Summary 2001-05, "Guidance on Submitting Documents to the NRC by Electronic Information Exchange or on CD-ROM," states that electronic submittal need not be accompanied by a paper copy. The current proposed rule appears to reverse this guidance. In addition, there appears to be guidance for Electronic Document Interchange (EDI) from other Federal Agencies including the National Archive Administration (NARA), the General Services Administration (GSA), the Internal Revenue Service (IRS) and the Office of Management and Budget (OMB). These agencies allow electronic document submittal under specific conditions using prescribed transmittal formats and standards that meet objectives for technology neutrality. The clear direction is to move towards this standard EDI guidance.

The benefits of a purely electronic process can be substantial in terms of increased efficiency and cost savings. Potential productivity gains include streamlined review and approval processes, expedited publication and distribution, and elimination of hardcopy files. Potential benefits include elimination of hardcopy reproduction for review, routing and approval, and subsequent distribution. These benefits are magnified with very large documents, such as the Updated Final Safety Analysis Report, which can require

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significant effort to reproduce, collate, assemble and ship in hardcopy. SCE recommends eliminating the requirement that a CD-ROM submission be accompanied by a signed paper copy.

If you have any questions or would like additional information concerning this subject, please contact Mr. Scott Medling at (949-368-7492).

Sincerely,



cc: E. W. Merschhoff, Regional Administrator, NRC Region IV
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